

**United States Bankruptcy Court  
Eastern District of Virginia**

In re Alice Thomas

Debtor(s)

Case No. 18-12376

Chapter 13

**DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY**

The debtor, Alice Thomas ("Debtor"), through her attorney, Edward Gonzalez VA Bar #39882, requests that the Court extend the automatic stay under 11 U.S.C. § 362(a) as to all creditors pursuant to 11 U.S.C. §362(c)(3)(B). In support of his request, Debtor states as follows:

1. Debtor filed a petition under Chapter 13 on July 8, 2018.
2. Debtor previously filed a Chapter 13 case on December 11, 2017, and the case was assigned case number 17-14198-KHK. The case was dismissed on 01/10/2018, because Debtor, who filed her case *pro se*, did not timely file the balance of her schedules and plan.
3. The petition in this case has been filed in good faith as to all creditors. Debtor believes that the Chapter 13 plan he has submitted will be confirmed and that she will be able to fully perform under the terms of the plan.
4. Since the filing of the last petition Debtor has taken steps to assure success in the prosecution of this case. She has hired counsel to assist her in moving the case forward and obtain confirmation of a plan. Furthermore, the Debtor, who was formally self-employed and struggling in her new business making income that varied from between \$4,247.00 and \$6,000 per month, has since found permanent employment as a psychologist with a major medical provider making gross income of \$5,667 per month. With benefits such as health insurance, puts her on firmer financial footing. Finally, given that the property has a minimum of \$50,000 in equity, the Debtor is in a position to propose a liquidation Chapter 13 if reorganization is not possible. The mortgage lender is protected.
4. There was one motion for relief from the automatic stay, but no objections to confirmation, or other pleadings filed against Debtor by any of his creditors in the previous case. Debtor did not voluntarily dismiss her case as a response to the motion for relief from stay.

WHEREFORE, Debtor requests that this Court continue the automatic stay under §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d).

Dated: July 11, 2018

Respectfully submitted,

Edward Gonzalez, Counsel for Debtor

By: /s/ Edward Gonzalez VA Bar

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